

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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Southern District of New York  
*Jennifer L. Brown*  
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September 13, 2020

By ECF

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

9/14/2020

Mr. Ragonese may file his  
sentencing submission on  
Friday, September 25,  
2020. SO ORDERED.



Re: United States v. Ryan Ragonese, 19 Cr. 154 (PAC)

Honorable Judge Crotty:

Ryan Ragonese is scheduled to be sentenced on September 30, 2020, but the final Presentence Report ("PSR") in his case will not be released until September 23rd or 24th. Because we await the Probation Office's resolution of our objections to two guidelines enhancements, we write to respectfully request that the Court permit us to file the defense sentencing submission on Friday, September 25, 2020, after we review the final PSR. The government is aware of our guidelines objections and the bulk of our mitigation arguments, and we believe it would not be prejudiced by simultaneous or near-simultaneous sentencing submissions.

We thank the Court for its consideration.

Respectfully submitted,

/s/

Annalisa Mirón/ Ariel Werner  
Assistant Federal Defender  
Federal Defenders of New York  
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cc: AUSA Daniel Wolf